

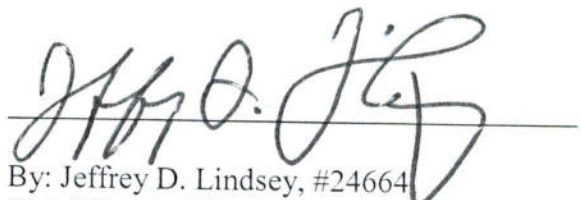
REDACTED

DISTRICT COURT, EL PASO COUNTY, COLORADO 270 S. Tejon St. Colorado Springs, CO. 80903	FILED IN THE DISTRICT AND COUNTY COURTS OF EL PASO COUNTY, COLORADO
People of the State of Colorado vs. ROBERT LEWIS DEAR, JR. Defendant	S.K. DEC 10 2015 DR. LYNETTE CORNELIUS CLERK OF COURT
Chief Deputy District Attorney: Jeffrey D. Lindsey Address: 105 E. Vermijo, Colorado Springs, CO. 80903 Phone Number: 520-6000 Attorney Registration #: 24664 District Attorney: Daniel H. May, # 11397	▲ COURT USE ONLY ▲ Case #: 15CR5795 Division #: 10 Courtroom #: W570
P-006	
STIPULATION REGARDING PLANNED PARENTHOOD CLINIC SCENE VIEW BY THE OFFICE OF THE PUBLIC DEFENDER	

The District Attorney, by and through his Chief Deputy District Attorney, Jeffrey D. Lindsey, hereby informs the Court that the parties have agreed to following procedures during the Court-Ordered scene view by the Public Defender's Office.

1. During the scene view of the Planned Parenthood Clinic (the Clinic) the Public Defender will not photograph, record or remove from the Clinic in any form information that would identify any patient or staff member of Planned Parenthood. This includes information that may be located in any exam rooms, waiting rooms, employee areas, file storage areas, as well as photographs of employees and their families that may be located on the walls or in the offices of the Clinic.
2. If an item listed above has some evidentiary value and it is necessary to document, the Public Defender agrees to not disclose the information beyond their trial team without further leave of the court.
3. If it happens that during the scene view the Public Defender accesses any of this information inadvertently, the Public Defender agrees to not further disseminate this information consistent with the protective order entered in P-005.
4. Outside of the court process, the Public Defender's Office shall not disclose to any third party or the Defendant the nature or location of any security measure employed at the clinic including locked doors, building design and any other measure designed to protect employees and patients of the clinic.

WHEREFORE, the District Attorney respectfully requests this Court approve the stipulation.


By: Jeffrey D. Lindsey, #24664
Chief Deputy District Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **STIPULATION REGARDING PLANNED PARENTHOOD CLINIC SCENE VIEW BY THE OFFICE OF THE PUBLIC DEFENDER (P-006)** has been forwarded to the Public Defender's Office by placing it into the Public Defender's box for pickup:

12/10/15

Mira Jacques